

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN-NORTHERN DIVISION

IN RE:

Case No. 20-20426-dob

CHARLES C. HAGER  
STEPHANIE K. HAGER,

Debtor(s).

Chapter 7

JUDGE DANIEL S. OPPERMAN

**TRUSTEE'S APPLICATION TO EMPLOY BK GLOBAL REAL ESTATE SERVICES  
TO PROCURE CONSENTED PUBLIC SALE PURSUANT TO 11 U.S.C. § 327**

NOW COMES Randall L. Frank, Chapter 7 Trustee, by his attorney, Randall I. Frank, and hereby files this Application to Employ BK Global Real Estate Services to procure consented public sale, pursuant to 11 U.S.C. § 327, states as follows:

- (1) Randall Frank is the Chapter 7 Trustee of the bankruptcy estate to administer and liquidate assets of the above estate, said Voluntary Petition being filed on March 3, 2020.
- (2) An asset of the bankruptcy estate is real property located at 33419 N 53RD PL CAVE CREEK, AZ 85331, and which is further described as follows:

**Parcel Number:** 211-29-016

**Zoning:** R-43

**Census Tract:** 040136130.002009

**Carrier Route:** H015

**Abbreviated Description:** LOT:5 SEC/TWN/RNG/MER:SEC 8 TWN 5N  
RNG 4E TAPEKIM NORTH

hereinafter referred to as the "Real Property".

- (3) The debtors have not declared the Real Property as exempt, as they are surrendering the property.
- (4) The debtors listed the Real Property on their schedules as having a value of \$226,700.00
- (5) The Real Property is subject to the following mortgage(s) or lien(s):
  - a. First Mortgage Holder: Mr. Cooper
  - b. Second Mortgage Holder: JP Morgan Chase Bank

- (6) The Secured Creditors holding mortgages or liens pursuant to the Debtors' Schedules or filed proofs of claims setting forth the following balances due and owing on the Real Property:

Mr. Cooper in an amount exceeding \$299,772.00

JP Morgan Chase Bank in an amount exceeding \$83,536.00

- (7) Based upon the market value of the Real Property provided by the debtors and the Proof of Claim [or schedules], of the debtors, the first mortgage debt is in excess of the market value of the Real Property.
- (8) The Handbook for Chapter 7 Trustees published by the Executive Office of the United States Trustee, states on pages 4 – 14 under Section 9 "Sales of Assets" (a) General Standards "A Trustee may sell assets only if the sale will result in a meaningful distribution to creditors. The Section further states "the Trustee may seek a "carve-out" from a secured creditor and sell the property at issue if the "carve-out" will result in a meaningful distribution to creditors. Further, the Section states "The Trustee must also consider whether the cost of administration or tax consequences of any sale would significantly erode or exhaust the estate's equity interest in the asset."
- (9) BK Global Real Estate Services ("BK Global") provides services to trustees as BK Global has expertise and experience in assisting the Trustee in negotiating with secured creditors to accomplish the following:
- a. Sell the Real Property under 11 U.S.C. § 363(b) to whichever party the Chapter 7 Trustee determines to have made the best qualified offer with the sale approved by the Court, pursuant to 11 U.S.C. § 363;
  - b. Obtain the release the senior mortgage and waive all of its claims against the estate with respect to the Real Property (including any deficiency claims resulting from the proposed sale);
  - c. Work with the secured mortgage holder to enter into an agreement for an 11 U.S.C. §506 surcharge to pay all of the closing expenses associated with the §363 sale, including the payment of a six percent (6%) real estate brokerage commission and reimbursement of their out-of-pocket expenses to BK Global and any associated real estate professional, paid from the proceeds of the sale, and provide a meaningful carve out of 3% - 5% of the sale price for the benefit of the Bankruptcy Estate; and
  - d. Make certain the amount of the carve out is clearly set out in the motion to sell the Real Property pursuant to 11 U.S.C. §363.
- (10) BK Global will assist the Chapter 7 Trustee in negotiations with the first mortgage holder to obtain the consent of the first mortgage holder for the sale of the Real Property. The secured creditor will agree to a carve out from the sale price of the Real Property for the payment of a six percent (6%) real estate commission to BK Global, and any associated real estate professional, and a

carve out of 3% - 5% of the sale price paid to the Bankruptcy Estate, which will result in a meaningful distribution. Upon a successful resolution with the Secured Creditor a separate motion will be filed seeking approval of the settlement terms and conditions.

- (11) BK Global will not be entitled to any fees if the first mortgage holder does not grant its consent or the Court does not grant the motion to approve the sale of the Real Property.
- (12) In no event will the bankruptcy estate have any obligation to pay BK Global or associated real estate professional for their services, or to pay the customary title and closing services. The terms of the listing agreement and this application provide that BK Global or associated real estate professional are only entitled to payment if and when (a) secured creditor grants its consent, (b) the motion to approve sale is granted and (c) the Real Property is sold, in which event BK Global or associated real estate professional will receive a six percent (6%) real estate brokerage commission and obtain reimbursement of any out-of-pocket expenses.
- (13) The Trustee believes that the highest and best value for the Real Property will be generated through a sale in which the Real Property is widely marketed to the public and offered at the highest price that the market will bear. The Trustee further believes that such a sale is in the best interest of the Debtors' bankruptcy estate but can only be achieved if the Secured Creditor's consent is first obtained. The Chapter 7 Trustee believes that the employment of BK Global and/or an associated real estate professional to obtain the secured creditor's consent is in the best interest of the debtors' bankruptcy estate.
- (14) The Trustee submits that the terms of employment and compensation as set out in this application and the listing agreement (Exhibit "B"), are reasonable in light of the extensive experience of BK Global and any associated real estate professional, and the nature of the services they provide.
- (15) BK Global attested that it is a disinterested person within the meaning of Section 101(14) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 2014 and 2016(a). Attached hereto as Exhibit "B" is an Affidavit of Disinterestedness of BK Global. BK Global also attests, pursuant to Bankruptcy Rule 2016, that it shall not split or share its fee with any individual or entity other than listing agent or a buyer's agent, if applicable.

WHEREFORE, based upon the foregoing, the Chapter 7 Trustee praying for an order authorizing employment of BK Global in this case and requests that the Court approve the compensation arrangements set forth in the listing agreement and this application, pursuant to Sections 327, 328(a) and 330 of the Bankruptcy Code; and for such other and further relief as the Court determines is appropriate.

DATED: April 22, 2020

/s/ Randall L. Frank  
*Randall L. Frank*  
*Chapter 7 Trustee*  
*P.O. Box 2220*  
*Bay City, MI 48707-2220*  
[Randall.frank@gmail.com](mailto:Randall.frank@gmail.com)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN-NORTHERN DIVISION

In Re: )  
 ) Case No. 20-20426-dob  
CHARLES C. HAGER )  
STEPHANIE K. HAGER, )  
 )  
Debtor(s). ) Chapter 7  
JUDGE DANIEL S. OPPERMAN

**ORDER AUTHORIZING EMPLOYMENT OF BK GLOBAL REAL ESTATE SERVICES**

This matter having come before this Court, pursuant to the Trustee's Application to Employ BK Global Real Estate Services pursuant to 11 U.S.C. § 327. The Court, having reviewed the Application to Employ BK Global Real Estate Services, which holds no interest adverse to the estate, and is a disinterested party as required by 11 U.S.C. §327(a), and having determined that the employment of a real estate broker and agent is necessary and in the best interest of the estate, does:

IT IS HEREBY ORDERED that the Trustee is authorized to employ BK Global Real Estate Services, as a real estate broker and agent of the estate for the purpose of marketing and selling the real property located at:

33419 N 53RD PL CAVE CREEK, AZ 85331

**Parcel Number:** 211-29-016

**Zoning:** R-43

**Census Tract:** 040136130.002009

**Carrier Route:** H015

**Abbreviated Description:** LOT:5 SEC/TWN/RNG/MER:SEC 8 TWN 5N  
RNG 4E TAPEKIM NORTH

IT IS FURTHER ORDERED that compensation to BK Global Real Estate Services shall be paid and expenses reimbursed as awarded by the Court upon proper application or in conjunction with an Order entered by the Court approving the sale of the real property at issue.

**EXHIBIT "A"**

## EXHIBIT B

### BK Global Real Estate Brokerage Listing Agreement

This Real Estate Brokerage Listing Agreement ("Agreement") is between

Randall Frank ("TRUSTEE") and **BK Global Real Estate Services LLC** ("BROKER")

**Authority to Sell Property:** Trustee gives Broker the right to be the EXCLUSIVE BROKER in the sale of the real and personal property (collectively "Property") described below:

33419 N 53RD PL CAVE CREEK, AZ 85331

Upon full execution of a contract for sale and purchase of the Property and court approval, all rights and obligations of this Agreement will automatically extend through the date of the actual closing of the sales contract. **Trustee and Broker** acknowledge that this Agreement does not guarantee a sale. This Property will be offered to any person without regard to race, color, religion, sex, handicap, familial status, national origin, or any other factor protected by federal, state, or local law. **Trustee** certifies and represents that she/he/it is legally entitled to convey the Property and all improvements.

**Price:** The starting listing price of the property will be: **\$385,000**. If there are no acceptable offers after 15 days, the list price will be reduced 5% and will reoccur every 15 days until the listing expires or if an acceptable offer is received.

**Brokers Obligations:** Broker will assist the Trustee to make commercially reasonable efforts to procure the consent and agreement of the senior mortgagee ("Secured Creditor") to:

- a) Sell the Property under 11 U.S.C. § 363(b) to whichever third party you determine to have made the best qualified offer during a public sale approved by the court or agree to 11 U.S.C. § 363(k) and place a credit bid on the Property from the estate;
- b) Release its lien with respect to the Property; and
- c) Agree to a 11 U.S.C. § 506 surcharge to (x) pay our fee and expenses, any commission payable to the local real estate broker and all other fees and

expenses associated with the sale, and (y) provide a carve-out for the benefit of allowed unsecured creditors of the estate.

**Brokers Duties:** Broker or associated real estate professional duties will include but will not be limited to the following services;

- Researching the real estate, running title and lien searches to identify creditors for resolution and any title issues.
- Advising the trustee of any issues and discuss potential resolutions.
- Conducting the resolutions under the trustee's direction.
- Assisting the Trustee in the collection of documents and information for employment.
- Making and identifying the correct contact with the secured creditors.
- Notifying the secured creditor of the upcoming sale and identifying servicer requirements.
- Assisting the trustee in establishing market value and negotiating with the Servicer an acceptable sales price and establishing a carve-out.
- Development of online marketing, email campaign and full nationwide marketing services.
- Conducting an onlinesale.
- Use of the BK Global technology platform.
- Assist the Trustee in the review of all offers and coordinate the final documentation of the offer accepted by the trustee.
- Managing contract requirements such as inspections, appraisals and HOA applications.
- Coordinating closings and assisting the trustee in the collection of required information for courtfiling.
- Closing the transaction and ensure the estate has received the appropriate funds.
- Inspecting the property and completing a broker's price opinion.
- Listing the property in the multiple listing service (MLS).
- Posting a for sale sign in the yard and coordinating showings.

**Trustee Obligations:** In consideration of **Broker's** obligations, **Trustee** agrees to:

- a) Cooperate with **Broker** in carrying out the purpose of this Agreement
- b) Provide **Broker** with keys to the Property and make the Property available for **Broker** to show during reasonable times.
- c) File all court motions and documents in a timely manner to ensure a successful sale.
- d) Advise **Broker** of any special issues our court requirements.

**Term of Agreement:** The term of this Agreement will commence when signed by the **Trustee** and the court approves it. This Agreement will automatically terminate upon the closing of the sale of the Property, or it may be terminated by either party for any or no reason after 180 days from commencement. In addition, this Agreement will be




terminated if the **Trustee** files a Report of No Distribution, files a Notice of Abandonment of the subject property, or submits a Trustee's Final Report to the Office of the United States Trustee.

**Broker** acknowledges and agrees that (a) the **Trustee** is not executing this Agreement in an individual capacity, but solely as trustee of the estate, (b) **Broker** does not and will not have any right or claim with respect to the estate and (c) **Brokers** sole recourse for payment of real estate commission, fees and expenses will be paid at closing with court approval and under the Consent of the Secured.


This Agreement constitutes our complete agreement on this matter and supersedes all prior agreements and representations concerning the same. It may not be modified or amended except in a writing signed by both parties.

**The effective date of this agreement is April 22, 2020.**

**BROKER:**

By:  Acknowledged and agreed as of the date set forth above.  
Patrick Butler, Broker-in-Charge

**TRUSTEE:**

 Acknowledged and agreed as of the date set forth above.  
Randall L. Frank, Chapter 7 Trustee, and not individually.

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
(BAY CITY)

In re:

Chapter 7

Case No. 20-20426-dob

Debtors  
Charles Hager  
Stephanie Hager

**DECLARATION OF PATRICK BUTLER IN SUPPORT OF APPLICATION  
TO RETAIN BK GLOBAL REAL ESTATE SERVICES TO PROCURE CONSENTED  
PUBLIC SALE PURSUANT TO 11 U.S.C. § 327, 328 AND 330**

The undersigned, Patrick Butler ("Declarant") hereby states:

1. I am employed by BK Global Real Estate Services ("Applicant" or "BKRES"), which is an entity duly licensed as a real estate brokerage by the State of Florida located at 1095 Broken Sound Parkway, N.W., Suite 100, Boca Raton, FL 33487. I am Applicant's broker-in-charge and am authorized by Applicant to submit this Declaration on Applicant's behalf in support of the annexed Application to Retain BKRES and in accordance with Bankruptcy Rule 2014.

2. Based upon the information discussed below, I believe that Applicant is a disinterested person and does not hold or represent any interest adverse to the interest of the Debtors' estate as that term is defined in Section 101(14) of the Bankruptcy Code.

3. To the best of my knowledge: (a) neither BKRES nor any of its employees has any connection with the Debtors, its creditors in this case, the Chapter 7 Trustee, the Office of the United States Trustee, or any employees thereof or any party in interest herein; (b) BKRES and each of its employees are "disinterested persons," as that term is defined in Section 101(14)

of the Bankruptcy Code; and (c) neither BKRES nor any of its employees hold or represent an interest adverse to the Debtors' estate.

4. A description of the qualifications of, and services provided by, BKRES is attached as Schedule 1.

5. That I have read the application of the Trustee regarding the retention and compensation of BKRES and agreed to be bound by the terms and conditions represented therein.

6. That I further understand that the Court, in its discretion, may alter the terms and conditions of employment and compensation, as it deems appropriate.

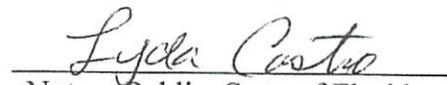
Verified under penalty of perjury that the foregoing is true and correct this 21 day of April, 2020.



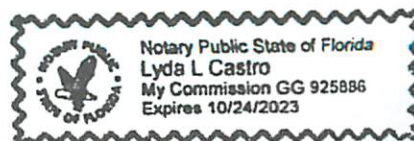
Patrick Butler  
Broker-in-Charge

The foregoing instrument was sworn to and subscribed before me this 21 day of April, 2020, by Patrick Butler who provided identification or is personally known to me and who did take an oath.

NOTARY PUBLIC

  
Notary Public, State of Florida

My Commission Expires



## **SCHEDULE I**

**BK Global Real Estate Services is a licensed real estate brokerage by the State of Florida, located at 1095 Broken Sound Parkway N.W., Suite 100, Boca Raton, Florida, 33487.**

**BK Global Real Estate Services has a strong background and extensive experience in dealing with the mortgage servicing industry and is considered an expert in assisting in the negotiations with secured creditors whose debt is in excess of the market value of the real property and in negotiating short sales.**

**BK Global Real Estate Services has been providing real estate services to Chapter 7 bankruptcy trustees since 2014.**

**BK Global Real Estate Services has developed a process to assist Chapter 7 trustees in the sale of over-encumbered real estate to obtain the consent of the secured creditor to allow the Chapter 7 trustee to sell the real property and to assist the Chapter 7 trustee in negotiating a carve out for the bankruptcy estate that will provide a meaningful distribution to the unsecured creditors..**

**BK Global Real Estate Services is to be retained by the Chapter 7 trustee pursuant to 11 U.S.C. § 327. The first step is for BK Global Real Estate Services to assist the Chapter 7 trustee in obtaining the consent of the secured creditor to allow the Chapter 7 trustee to sell the secured real estate. Those negotiations will include establishing a carve-out of the sale proceeds to the bankruptcy estate that will provide a meaningful distribution to unsecured creditors.**

**In addition, a carve out will be established to pay a real estate commission to BK Global Real Estate Services and a local real estate licensed broker. In addition, as part of the negotiations, the secured creditor will be required to waive the filing of any deficiency claim.**

**Once the Court has approved the retention of BK Global Real Estate Services and the local real estate licensed broker, then the real property will be listed for sale at an agreed listing price by the secured creditor.**

**A motion will be filed to approve the settlement and compromise reached between the Chapter 7 trustee and the secured creditor.**

**BK Global Real Estate Services has successfully assisted Chapter 7 trustees in 33 court districts in the consented program. BK Global Real Estate Services does this by achieving the highest sale prices for properties as opposed to the more common "discounted sale" often presented to secured creditors by less experienced service providers. The transaction is never consummated unless the carve-out percentage or fee is sufficient to provide a meaningful distribution to unsecured creditors. BK Global Real Estate Services has standards in the mortgage industry whereby all parties can have a mutually beneficial**

outcome to the sale. The sale of over-encumbered real estate in bankruptcy presents a superior outcome to all parties.

- Unsecured creditors achieve a meaningful distribution on many more bankruptcy cases than they do on 'no asset' cases;
- The Chapter 7 trustee is able to conduct these transactions in a very cost-effective manner substantiating the carve-out amounts generated in these sales; and
- Secured creditors achieve more favorable recovery than they would via foreclosure including minimized compliance risk.

Page 4-2 of the Handbook for Chapter 7 Trustee states that by virtue of 11 U.S.C. § 323(a) the trustee is a representative of the estate. Further, the handbook states, "The trustee is a fiduciary charged with protecting the interest of all estate beneficiaries – namely, all classes of creditors, including those holding secured, administrative, priority and non-priority unsecured claims, as well as the debtor's interest in exemptions and in any possible surplus property."

BK Global Real Estate Services is a licensed Real Estate Broker and acts in the capacity as a licensed agent/broker. As a member of the real estate professional association, BK Global Real Estate Services is permitted to work with local brokers and share fees for work conducted. Section 504(b) of the Bankruptcy Code permits the compensation BK Global Real Estate Services receives for work conducted on a case.

BK Global Real Estate Services has developed a nationwide network of licensed real estate brokers that are trained in the sale of over-encumbered real estate in bankruptcy. BK Global Real Estate Services co-lists the real estate with one of our local trained licensed brokers. The trustee hires both BK Global Real Estate Services and the local broker to perform the required services. The listing commission is split between BK Global Real Estate Services and the local broker.

For these fees, both BK Global Real Estate Services and the local broker share in the duties that are required to conduct a consented sale in bankruptcy.

BK Global Real Estate Services' services include, but are not limited to, the following:

- Researching the real estate, running title and lien searches to identify creditors for resolution and any title issues;
- Advising the trustee of any issues and discuss potential resolutions;
- Conducting the resolutions under the trustee's direction;
- Assisting the trustee in the collection of documents and information for employment;
- Making contact with the secured creditor(s);
- Notifying them of the upcoming sale and identifying servicer requirements;
- Assisting the trustee in establishing market value and negotiating with the servicer an acceptable sales price and establishing a carve-out;
- Development of online marketing, email campaign and full nationwide marketing services;

outcome to the sale. The sale of over-encumbered real estate in bankruptcy presents a superior outcome to all parties.

• Unsecured creditors achieve a meaningful distribution on many more bankruptcy cases than they do on non-asset cases.

• The Chapter 7 trustee is able to conduct these transactions in a very cost-effective manner substantiating the carve-out amounts generated in these sales and

• Secured creditors achieve more favorable recovery than they would via foreclosure including minimized compliance risk.

Page 4-2 of the Handbook for Chapter 7 Trustee states that by virtue of 11 U.S.C. § 541(c)(2) the trustee is a representative of the estate. Further, the handbook states, "The trustee is a fiduciary charged with protecting the interest of all estate beneficiaries - namely, all classes of creditors, including those holding secured, administrative, priority and non-priority unsecured claims, as well as the debtor's interest in exemptions and in any possible surplus property."

BK Global Real Estate Services is a licensed Real Estate Broker and acts in the capacity as a licensed agent/broker. As a member of the real estate professional association, BK Global Real Estate Services is permitted to work with local brokers and share fees for work conducted. Section 504(d) of the Bankruptcy Code permits the compensation BK Global Real Estate Services receives for work conducted on a case.

BK Global Real Estate Services has developed a nationwide network of licensed real estate brokers that are trained in the sale of over-encumbered real estate in bankruptcy. BK Global Real Estate Services co-lists the real estate with one of our local trained licensed brokers. The trustee hires both BK Global Real Estate Services and the local broker to perform the required services. The listing commission is split between BK Global Real Estate Services and the local broker.

For these fees, both BK Global Real Estate Services and the local broker share in the duties that are required to conduct a consensual sale in bankruptcy.

BK Global Real Estate Services/ services include, but are not limited to, the following:

- Researching the real estate, running title and lien searches to identify creditors for resolution and any title issues;
- Advising the trustee of any issues and discuss potential resolutions;
- Conducting the resolution under the trustee's direction;
- Assisting the trustee in the collection of documents and information for employment (including contact with the secured creditor);
- Notifying them of the upcoming sale and identifying service requirements;
- Assisting the trustee in establishing market value and negotiating with the service on acceptable sales price and establishing a carve-out;
- Development of online marketing, email campaign and full nationwide marketing services;

- Conducting on online sale;
- Use of the technology platform;
- Assist the trustee in the review of all offers and coordinate the final documentation of the offer accepted by the trustee;
- Managing contract requirements such as inspections, appraisals and HOA applications;
- Coordinating closings and assisting the trustee in the collection of required information for court filing; and
- Closing the transaction and ensure the estate has received the appropriate funds.

Local broker services include, but are not limited to:

- Inspecting the property and completing a broker's price opinion;
- Listing the property in the multiple listing service (MLS); and
- Posting a for sale sign in the yard and coordinating showings.

U.S. Bankruptcy Court Districts where BK Global Real Estate Services conducted Consented Sales:

- |                                   |                                      |
|-----------------------------------|--------------------------------------|
| • District of Arizona             | • District of Minnesota              |
| • Eastern District of Arkansas    | • Western District of Missouri       |
| • Southern District of California | • Eastern District of Missouri       |
| • Eastern District of California  | • District of Montana                |
| • Central District of California  | • District of Nevada                 |
| • Northern District of California | • District of New Jersey             |
| • Southern District of California | • District of New Mexico             |
| • District of Colorado            | • Eastern District of New York       |
| • District of Columbia            | • Eastern District of North Carolina |
| • Northern District of Florida    | • Western District of North Carolina |
| • Middle District of Florida      | • Northern District of Ohio          |
| • Northern District of Georgia    | • Southern District of Ohio          |
| • Southern District of Georgia    | • Western District of Pennsylvania   |
| • Northern District of Illinois   | • Middle District of Pennsylvania    |
| • Northern District of Indiana    | • Eastern District of Pennsylvania   |
| • Southern District of Indiana    | • District of South Carolina         |
| • District of Kansas              | • Middle District of Tennessee       |
| • Western District of Kentucky    | • Western District of Tennessee      |
| • Eastern District of Louisiana   | • Southern District of Texas         |
| • Western District of Louisiana   | • Western District of Texas          |
| • District of Maryland            | • Northern District of Texas         |
| • District of Massachusetts       | • Eastern District of Virginia       |
| • Western District of Michigan    | • Western District of Washington     |
| • Eastern District of Michigan    |                                      |

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN – NORTHERN DIVISION**

**In re:**

**Case No. 20-20426  
Chapter 7**

**Charles Hager  
Stephanie Hager**

**Debtors**                                 /

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**AFFIDAVIT OF HEENA KHATRI IN SUPPORT OF APPLICATION  
TO RETAIN BK GLOBAL REAL ESTATE SERVICES AND URBANCITI  
REALTY & PROPERTY MANAGEMENT TO PROCURE CONSENTED  
PUBLIC SALE PURSUANT TO 11 U.S.C. § 327, 328 AND 330**

STATE OF ARIZONA                         )  
   )  
COUNTY OF Maricopa                         )

Heena Khatri, being duly sworn, says:

1.           I am a real estate agent duly licensed by the State of Arizona.
2.           I am an agent of UrbanCiti Realty & Property Management a  
Arizona Corporation, with corporate offices located at 4400 N Scottsdale Rd. Ste 9270  
Scottsdale, AZ 85251, ("Listing Agent").
3.           I am familiar with the Application to Retain UrbanCiti Realty &  
Property Management, filed by the Trustee ("Application") and the property described  
therein.
4.           I believe that I am experienced and qualified to represent the Trustee  
in connection with the marketing and sale of the real property located at 33419 N 53RD  
PL CAVE CREEK, AZ 85331 (the "Property").
5.           UrbanCiti Realty & Property Management has agreed to accept  
employment pursuant to the terms and conditions set forth in the Application and the  
proposed commission structure. Based upon my experience and knowledge of the real  
estate market, I believe that the commission structure proposed to be paid to Listing Agent  
does not exceed customary commissions in the applicable geographical area and are  
reasonable for the type of employment proposed.
6.           Neither I nor any member of UrbanCiti Realty & Property



6. Neither I nor any member of UrbanCiti Realty & Property Management hold or represent any interest adverse to the estate with respect to the matters for which we are to be employed and we are disinterested persons within the meaning of 11 U.S.C. § 101(14), as required by § 327(a).

7. To the best of my information and belief, neither I nor the other members of this firm have any connection with the Debtors, their creditors, or any other party in interest or their respective attorneys or accountants, the U. S. Trustee, or any person employed in the office of the U.S. Trustee, as required by Rule 2014 of the Federal Rules of Bankruptcy procedure except as set forth below.

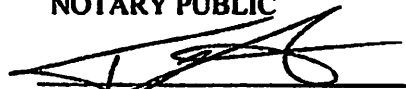
8. I represent no interest adverse to the Debtors or its estate in the matters upon which I am to be engaged.

FURTHER AFFIANT SAYETH NAUGHT.

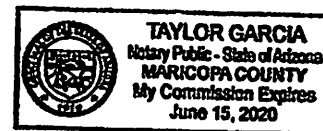
  
Heena Khatri of  
UrbanCiti Realty & Property  
Management

The foregoing instrument was sworn to and subscribed before me this 31<sup>st</sup> day of  
March, 2020.

NOTARY PUBLIC

  
Notary Public, State of  
Arizona

Taylor Garcia  
Type, Stamp, or Print Name as  
Commissioned



UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

IN RE:

CHARLES C. HAGER,  
STEPHANIE K. HAGER,

Case No. 20-20426-dob

Chapter 7 Proceeding  
Honorable Daniel S. Opperman

**STATEMENT OF CONSENT OF THE U.S. TRUSTEE TO EMPLOYMENT OF  
BK GLOBAL REAL ESTATE SERVICES, AS REAL ESTATE BROKER**

The Office of the U.S. Trustee hereby consents to entry of an Order approving employment of BK Global Real Estate Services, as Real Estate Broker to the Chapter 7 Trustee.

OFFICE OF THE U.S. TRUSTEE

DATED: April 23, 2020

/s/ Leslie K. Berg

\_\_\_\_\_  
Leslie K. Berg  
Office of the U.S. Trustee  
211 W. Fort Street, Suite 700  
Detroit MI 48226  
(313) 226-7950  
Leslie.K.Berg@usdjo.gov